DEPARTMENT OF ENVIRONMENTAL QUALITY

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SECRETARY

CERTIFIED MAIL 7004 1160 0000 3793 6061

Mr. Larry L. Lambiotte, President
PolyVulc, USA
1645 Haining Road
Vicksburg, Mississippi 39182

RE: Technically Complete Environmental Assessment Statement
Winnsboro Rubber Recycling, L.L.C.
AI# 81852 / RP-041-8756 / PER20010001
Franklin Parish

Dear Mr. Lambiotte,

The Water and Waste Permits Division is in receipt of the final copies of your updated Environmental Assessment Statement (EAS) identified as "Supplemental Information Required by the "IT Decision" and LAC 33:VII.523." After review of the updated documents, we have determined that your Environmental Assessment Statement is technically complete and it will be made available for public review.

The Environmental Assistance Division will distribute copies of your Environmental Assessment Statement for public review and place public notices in the appropriate newspapers in accordance with LAC.33:VII.513.F.3. Please contact Ms. Soumaya Ghosn at (225) 219-3276 for the date of publication and the dates for the comment period. At the conclusion of the comment period, the Water and Waste Permits Division will consider all comments regarding the Environmental Assessment Statement.

Please reference Agency Interest Number (AI 81852), Site Identification Number (RP-041-8756), and Permit Activity Number (PER20010001) on all future correspondence pertaining to this matter. If you have any questions, please contact Kelley Templet at (225) 219-3068.

Sincerely,

Lenny Young
Administrator
Water and Waste Permits Division

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c: Kraig Gwin, Plant Manager

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Supplemental Information Required by the "IT Decision" and LAC 33:VII.523.

Winnboro Rubber Recycling, LLC
AI 81852/RP-041-8756
Franklin Parish (PER20010001)

Facility Overview

Winnsboro Rubber Recycling, LLC ("WRR") has filed an application for a solid waste permit authorizing WRR to process tires pursuant to LAC 33:VII Chpt. 5 and LAC 33:VII Chpt. 105 at its facility located at 3000 Industrial Park Road in Winnsboro, Louisiana (Franklin Parish). The facility will utilize state-of-the-art technology to process waste tires into a fine rubber crumb which is a suitable feedstock for various manufactured rubber products, such as railroad ties, air conditioning pads, rubber in asphalt roads and rubber in new tires. Unlike other waste tire processors currently operating in Louisiana, WRR will process waste tires into a useful product that will be incorporated into manufactured goods; shredded waste tires will not be disposed of or used in solid waste landfills. WRR will turn waste tires into a beneficial product that recycles waste materials back into the economy, while avoiding the harmful environmental effects of disposing of or using processed waste tire materials in landfills. WRR has already been certified by LDEQ as a qualified recycler and the rubber crumb has been recognized as a legitimate end use product. The pending permit application will further qualify WRR as a waste tire processor entitling WRR to receive waste tires – the front end of the process of turning waste tires into rubber crumb.

1. **Are there alternative sites which would offer more protection to the environment than the proposed site without unduly curtailing non-environmental benefits to the extent applicable?**

No. The threshold site selection criterion was that, due to the location of other existing permitted waste tire processors, this facility should be located in northeast Louisiana. No existing tire shredding operation is located in the northeast portion of the state. Accordingly, there is an untapped supply of waste tires that could be economically transported to a local facility. Existing shredders are located in Shreveport, Cottonport, Port Allen, Sibley, and Lake Charles. Location of WRR's facility in northeast Louisiana logically focuses on a supply area bounded: (1) to the north by the Arkansas state border: (2) to the west by Louisiana Highway 63/167; (3) to the south by Louisiana Highway 84; and (4) to the east by the Mississippi River. Location of the facility in an area of the state not adequately serviced by an existing tire shredding operation would benefit the state environmentally by encouraging and facilitating waste tire recycling. WRR concluded that environmental and economic considerations such as the availability of waste tires and the lower cost of transporting waste tires to a near-by facility

justified the location of the facility in northeastern Louisiana. No other potential location offered more environmental protection than the site selected in Winnsboro.

Other possible locations in and near the service area were considered by WRR in addition to Winnsboro. The original solid waste permit envisioned a facility in Bastrop, Louisiana. WRR acquired rights in that permit from East Louisiana Recycling, Inc., which in turn acquired rights from the original permitee. Bastrop was rejected as a potential facility site for several reasons. First, Bastrop is located too far north in the projected service area to provide for economical transportation of waste tires by suppliers throughout the area. Second, Bastrop is located north of Interstate 20 and the main approach route for tire suppliers would require that they travel more than 20 miles through heavy traffic on Highway 165. In WRR's opinion, Highway 165 was a major impediment to locating any such facility in Bastrop. Siting the facility in Bastrop would, in effect, abandon the southern portion of the service area by making it economically unfeasible for tire suppliers to reach the facility. Bastrop was a less desirable location for both economic and environmental reasons. While the increased transport distance, by itself, would have a negative environmental effect, it would also frustrate attempts to remove these waste tires from the environment by making disposal and recycling less feasible

WRR also considered Vicksburg, Mississippi as a location for this facility. PolyVulc USA, Inc's original involvement in this project resulted from its search for high quality recycled rubber for its manufacturing facility in Vicksburg, Mississippi, immediately across the Louisiana-Mississippi border. Unable to locate suitable recycled fine rubber grind suppliers in Louisiana, PolyVulc considered operating a waste tire processing facility at its Vicksburg location. However, the site of its Vicksburg facility is mostly land-locked by other properties and is unsuited for the expansion that would be necessary. Further, Vicksburg, like Bastrop, is not centrally located in relation to potential waste tire sources.

WRR considered two locations near Wisner, Louisiana in Franklin Parish. Both properties are located on Highway 15, approximately 7 miles south of Wisner. These properties proved inferior to Winnsboro for several reasons. Most importantly, the sites lacked necessary infrastructure. There were no existing buildings, inadequate electricity, inadequate sewage services, and inadequate roads. Further, the properties were relatively low in elevation, at 48 feet and 60 feet above sea level, which would likely have required expensive resurfacing work. Expensive and extensive infrastructure improvements would be necessary before the facility could operate at either site. The Wisner area also lacked a readily available workforce. Wisner is a town of only 1,140 people and nearby towns such as Gilbert and Sicily Island are similar. Also, Wisner could not provide adequate fire protection, forcing the prospective facility to rely on fire protection from Winnsboro – some 20 miles away. The Wisner locations did enjoy the support and encouragement of the local government and citizens. Given the negative factors cited herein, however, that local support was, by itself, insufficient to justify locating the facility at either Wisner site.

WRR concluded that the Winnsboro site was superior to the alternatives in every category. Located some 20 miles north of Wisner, Winnsboro is more centrally located in relation to the service area than any of the other sites considered. Significantly, the site considered by WRR was in an existing industrial park with full infrastructure already in place. Over 100,000 square feet of existing structures were available. The existing structures included

large indoor facilities and pre-wired three phase electricity, both necessary for the project. Transportation to or from the facility was superb, with a paved two-lane access road leading to a four lane highway. The existing industrial park provided a more than adequate buffer from residential areas. Unlike Wisner, the site was serviced by a full-time professional and volunteer fire department and the Fire Marshall was willing to acquire the equipment and training specific to the waste tire processing operation. Fire hydrants were located within 1500 feet of the facility and a water tower was in place in the industrial park.

Winnsboro has almost five times the population of Wisner. A suitable work force existed in and around Winnsboro and city officials actively courted WRR, working together to obtain a Economic Development Awards Program grant. By locating the facility in an existing industrial park, WRR avoided possible environmental concerns such as endangered species, wetlands, and cultural and archeologically sensitive areas.

2. Are there alternative projects which would offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable?

None of the possible alternative projects offered any greater protection to the environment than the proposed facility. In fact, the proposed facility represents the superior environmental response to the waste tire problem. One alternative would be to not construct any facility and to allow waste tires to continue to accumulate, uncollected, throughout northeast Louisiana - at businesses and services stations, or in ditches, backyards, and streams. Another alternative would be to open another conventional shredding operation to service northeast Louisiana; i.e., shred tires without processing them into rubber crumb. However, such an operation would not produce a usable end-product and shredded tires would likely end up in landfills. Further, neither alternative would be consistent with the impetus behind the creation of WRR – to provide a source of high grade fine rubber crumb to be used as a manufacturing feedstock. None of the existing tire shredders has proven capable and/or willing to produce the quality shredded tire pieces (meeting specifications as to size and metal content) suitable for processing into rubber crumb.

3. Are there mitigation measures which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits to the extent applicable?

No other mitigating measures would offer more protection than the proposed facility - producing fine rubber crumb from waste tires in Winnsboro. Potential environmental harms were mitigated by locating this facility in an existing industrial park (in contrast to a pristine area or on rural/agricultural property), with existing roads, sewer system, electricity, and buildings (in contrast to construction of new infrastructure), in an area with adequate existing fire protection. Even the alternative of not constructing any facility would not mitigate potential harms; rather, it would cause more environmental harm because waste tires would either be abandoned in place or shredded for landfill fill.

4. Have the potential and real environmental effects of the proposed project been avoided to the maximum extent possible?

Yes. The major environmental hazard associated with the project, or with any waste tire processing facility, is the threat of fire and resulting air pollution. This threat has been minimized by locating the facility in an area with full-time fire protection nearby. Further, arrangements have been made for local fire department officials to procure equipment and training relevant for this potential threat. Plant air pollution has all but been eliminated via an air filtration systems built by Mac Equipment of Kansas City, Missouri and Premier Pneumatics of Salina, Kansas. Dust and fibers generated from operations will be collected and filtered through a baghouse filter, a cyclone filter, and conveyor belt filter receivers, resulting in total air emissions of only 0.1 tons per year.

The industrial park's pre-existing drainage system provides for controlled storm water run-off. WRR's work plan provides that, to the maximum extent possible, waste tires will be processed on the day of receipt, thus eliminating environmental concerns relating to the storage of waste tires. Further, facility operations will be conducted indoors (or under roof) to avoid rainwater contact with waste tires.

The facility has protective barriers (fences, gates, walls, buffers zones) to reduce the possibility of unauthorized ingress or egress from the site, ensuring safety and environmental integrity. The plant is not located in a wetland area, near residential areas, near heavily populated areas, or near protected wildlife. The facility is located in a heavy industrial park.

In summary, WRR has analyzed potential and real environmental effects of the facility and has avoided those effects to the maximum extent possible. Not only have adverse effects been avoided by locating this environmentally beneficial project in an area where such effects are minimal, but WRR's operations and plans have minimized the remaining potential and real effects as much as possible.

5. Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the project demonstrate that the latter outweighs the former?

Yes. The cost/benefit analysis of the WRR project in Winnsboro presents a unique correlation between environmental cost and benefit. Because this is a project that encourages and promotes recycling of waste tires, the environmental impact "costs" pale in comparison to the environmental impact "benefits." This project will take waste tires out of the environment and process them into a usable product. Not only will waste tire piles in Louisiana be reduced, but the shredded tires will not be disposed of or used in Louisiana's landfills. The facility will encourage an alternative to the current method of waste tire management in the state that is both economically and environmentally superior to existing operations.

As explained above, the true and potential adverse effects of the project on the environment are minimal and have been reduced to the maximum extent possible by WRR's siting the facility in Winnsboro in an existing industrial park with an adequate existing environmental infrastructure.

Even if the minimal adverse environmental effects were not offset by the positive environmental effects of the project, they would be overwhelmed by the positive social and economic impacts of the facility. Due to WRR's affiliation with PolyVulc USA, markets for rubber crumb produced by recycling waste tires already exist. The impact on the community of Winnsboro will be substantial, creating new high paying jobs in an historically depressed area of the state. Waste materials that are currently an economic burden to the state will be a factor in the creation of jobs, income, and a useful marketable product. Cost benefit considerations indicate that the environmental, social, and economic benefits of the project far exceed the potential environmental costs.